Remarks

Status

Claims 1-9 and 11-45 are pending in the application, with claims 1, 9, 21, 30, 31, 33, 39 and 44 being the independent claims. In the January 20, 2004 Office Action, the Examiner rejected all of the claims. It is submitted that all of the currently pending claims (1-9 and 11-45) are patentable over the cited references for at least the reasons discussed below.

Interview

Applicants would like to thank Examiners Chung and Srivastava for the personal interview conducted April 20, 2004. In the interview Applicants discussed a brief description detailing aspects of the present invention, details of the prior art references and differences between the claimed invention and the prior art. The discussion also included reasons why the independent claims should be allowable over U.S. Patent No. 6,286,142 to Ehreth and U.S. Patent No. 5,574,964 to Hamlin. Specifically, Applicants suggested that neither Ehreth nor Hamlin, alone or in combination, disclose all of the features of the independent claims including at least a residential gateway that receives channel select commands directly from a remote control. The Examiner stated that further consideration and/or search would be conducted upon the filing of a Response or Amendment.

Obviousness-Type Double Patenting Rejections

Under the judicially created doctrine of obviousness-type double patenting, the Examiner provisionally rejected claims 1, 21 and 30 as being obvious over claim 1 of co-pending Application No. 10/443,744. Under the judicially created doctrine of obviousness-type double patenting, the Examiner provisionally rejected claims 9, 31 and 33 as being obvious over claim 3

of co-pending Application No. 10/443,744. The Applicants respectfully submit that because the Application is in condition for allowance that this rejection should be withdrawn.

Rejections Under 35 U.S.C. § 102

Claims 39, 41 and 43

In paragraph 15 of the Office Action, the Examiner rejects claims 39, 41 and 43 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,812,184 to Martinez. It is submitted that the claims are patentable over the cited reference for at least the following reasons.

Independent claim 1 is directed to an optical conversion device that receives optical signals, converts the optical signals to RF signals and transmits the RF signals over media. The optical conversion device includes an optical receiver that detects an optical signal and generates a corresponding pulse train. A bias switch is connected to the optical receiver and turns on and off in response to the pulse train. An oscillator is connected to the bias switch and produces a modulated RF signal in response to the bias switch. A diplex filter directionally injects the RF signal onto the media.

It is respectfully submitted that Martinez does not disclose or suggest an optical conversion device as recited in independent claim 39. Martinez discloses (col. 9, lines 8-27) a device including an optical receiver 24 that sends a signal to microprocessor 53. The microprocessor 53 formats the signal and applies to AND gate 59. AND gate 59 receives a gating signal from TDM slot selector 29 and the output of the AND gate is applied "to modulator 65 which in turn transmits that message "downlink" on cable 7 via isolator 47 and coupler 11. Oscillator 63 and crystal 61 generate the RF carrier for that viewer response."

For example, Martinez does not disclose a bias switch that is connected to the optical receiver and turns on and off in response to a pulse train generated by the optical receiver. The Examiner alleges (paragraph 8) that AND gate 59 is a bias switch connected to the optical receiver 24. However, AND gate 59 is connected to the microprocessor 53 and the TDM slot selector 29 and "turns on and off" (goes high or low) in response to signals from the TDM slot selector 29. Thus, AND gate 59 is not a bias switch that is responsive to a pulse train from

optical receiver 24. Additionally, Martinez does not disclose an oscillator connected to a bias switch for producing modulated RF signals in response to the bias switch. Martinez discloses a modulator 65 connected to the AND gate 59 "which in turn transmits the message "downlink" on cable 7 via isolator 47 and coupler 11." Thus, oscillator 63 (and crystal 61) which generate the RF carrier are not connected to the bias switch (AND gate 59) and do not turn on and off in response to the AND gate 59, the oscillator and crystal are responsive to modulator. For another example, Martinez does not disclose a diplexer filter for directionally injecting the RF signal onto the media. Martinez discloses that isolator 47 and coupler 11 are used to inject a modulated signal onto media (coaxial cable 7) but does not disclose how the RF signal is injected onto media. Furthermore, neither isolator 47 nor coupler 11 is disclosed as being a "diplex filter" and the Examiner fails to state were this limitation is taught by Martinez.

Claims 41 and 43 depend upon independent claim 39 and are submitted to patentable for at least the reasons described above with respect to claim 39 and for the further features recited therein.

Rejections Under 35 U.S.C. § 103

Claims 1-3, 8-10, 16, 21, 24 and 25

In paragraph 5, the Examiner rejected claims 1-3, 8-10, 16, 21, 24 and 25 are rejected under 35 U.S.C. § as being obvious over U.S. Patent No. 6,286,142 to Ehreth in view of U.S. Patent No. 5,574,964 to Hamlin. Claim 10 has been cancelled. It is submitted that the amended claims are patentable over the cited references for at least the following reasons.

Independent claim 1 is directed to a method of receiving, decoding and distributing video signal from a telecommunications network to a plurality of televisions. The method includes receiving, at a receiver within the residential gateway, channel select commands from remote control devices associated with the plurality of television including a first channel select command from an optical remote control device associated with a television located in close proximity to the residential gateway. A video signal is received from the telecommunications network and transmitted to a video processor. The video signal is processed to produce a television signal and the television signal is transmitted to a respective television.

It is respectfully submitted that Ehreth and Hamlin, either alone or in combination, fail to teach or suggest a method as recited in independent claim 1. Ehreth discloses a remote control 70 transmits a channel select command to channel selection and signaling unit 50 which sends a signal, at a user selectable frequency, to the receiver 80 that is within the residential gateway 30. Network interface 32 receives a video signal from the telecommunications network 40 and transports the signal to the modulating unit 34. Modulating unit 34 modulates the video signal to a frequency, which matches the user selected frequency of channel selection and signal unit 50, and transmits the modulated video signal to the receiver 80. Receiver 80 transmits the video signal over media 90 to the channel selection and signaling units 50 and the channel selection and signaling unit 50 transmits a television signal to a television 100. In short, Ehreth discloses that for every television 100 a channel selection and signaling unit 50 receives a channel select command from the remote control 70 and transmits a signal over a wire to residential gateway 30. Hamlin discloses a signal distribution system having a residential gateway 34, a system controller 38, a signal transceiver 40, multiple receiving units 46, interface pods 44 and a remote control device 42. The system controller 38 stores data therein related to the multiple receiving units. In operation, a channel select command is received from remote control 42 at the signal transceiver 40 which converts the signal to electrical signal that is sent to system controller 38. System controller 38 interprets the command and outputs a control signal to residential gateway 34 which in turn sends a signal over media to a selected interface pod 44. Interface pod transmits the signal to the receiving unit 46.

Ehreth and Hamlin, either alone or in combination, fail to disclose that "a first channel select command from an optical remote control device associated with a first television located in close proximity to the residential gateway is received directly by a receiver within the residential gateway." The claimed invention allows for a residential gateway to be placed on (or near) one television (the television located in close proximity) and to receive channel select commands directly from a remote control device used to control the television. The residential gateway also controls the television signal sent to other televisions throughout the building. Ehreth discloses that the residential gateway always receives channel select commands from a remote control at the channel selection and signaling unit. The channel selection and signaling unit sends a signal to the residential gateway. Also, Ehreth fails to teach or suggest a residential gateway that is

located in close proximity to one television and receives channel select commands directly from a remote control device. Hamlin fails to disclose or suggest receiving at a receiver within the gateway, a channel select command directly from a remote control device associated with a television located in close proximity to the residential gateway. Also, Hamlin states (col. 3, lines 8-9) that the residential gateway (converter 34) may be located outside the house, which suggests that the gateway should not be located near a television.

The teachings of Hamlin may not be used to modify Ehreth without destroying Ehreth. As described in detail above, Ehreth discloses that the channel selection and receiving unit 50 must transmit a signal upstream to the receiver 80 in order for the modulating unit 34 to select a frequency to send the modulated signal. This modulated signal is sent to all of the channel selection and signaling units 50 located in a building, but only the channel selection and signaling unit 50 that is set to the proper frequency will receive the modulated signaling. Modifying Ehreth with the teachings of Hamlin would result in a single remote control that transmits a command signal to a control device. This would require replacing the channel selection and signaling units 50 with interface pods and replacing the residential gateway 30 with a new residential gateway and separate control device that controls the gateway. This essentially removes all of the elements taught by Ehreth and results in Hamlin. Thus, Hamlin can not be used to modify Ehreth.

Therefore, it is respectfully submitted that claim 1 is allowable over Ehreth and Hamlin, either alone or in combination. Claims 2, 3, and 8 depend upon independent claim 1 and are submitted to be patentable for at least the reasons described above with respect to claim 1 and for the further features recited therein. Also, with regards to claim 8, claim 8 depends on claim 4, which was not rejected by Ehreth in view of Hamlin, thus the rejection of claim 8 is improper.

Independent claim 9 is drawn to a residential gateway for distributing video signals to a plurality of televisions. The gateway includes a receiver an optical receiver that receives channel select commands from a remote control device associated with a first television located in close proximity to the residential gateway. A remote control processor processes the channel select commands. A network interface module receives video signals from a telecommunications

network and a video processor processes the received video signals to produce television signals. A transmitter transmits the received video signals to the video processor.

It is respectfully submitted that Ehreth and Hamlin, either alone or in combination, fail to teach or suggest a residential gateway as recited in independent claim 9.

For example, Ehreth and Hamlin, either alone or in combination, fail to teach or suggest a residential gateway that is located in close proximity to a television and that has an optical receiver for directly receiving channel select commands from a remote control associated with the television. As described above, Ehreth discloses a remote control 70 that sends optical signals to channel selection and signaling unit 50 which in turn sends electrical signals, over media 90, to a communication controller 30. Therefore, Ehreth fails to teach or suggest that communication controller 30 directly receives optical signals from remote control 70 or that the television 100 is located in close proximity to the communication controller. Hamlin discloses that the remote control 42 transmits signals to signal transceiver 40 that sends a signal to system control 38, which in turns sends a programming command to converter 34. Therefore, Hamlin does not teach or suggest that the converter 34 directly receives optical signals from remote control 42 or that converter is located in close proximity to a television.

The teachings of Hamlin may not be used to modify Ehreth without destroying Ehreth. As described in detail above, Ehreth discloses that the channel selection and receiving unit 50 must transmit a signal upstream to the receiver 80 in order for the modulating unit 34 to select a frequency to send the modulated signal. This modulated signal is sent to all of the channel selection and signaling units 50 located in a building, but only the channel selection and signaling unit 50 that is set to the proper frequency will forward the modulated signal to a television 100. Modifying Ehreth with the teachings of Hamlin would result in a single remote control that transmits a command signal to a control device. This would require replacing the channel selection and signaling units 50 with interface pods and replacing the residential gateway 30 with a new residential gateway and separate control device that controls the gateway. This essentially removes all of the elements taught by Ehreth and results in Hamlin. Thus, Hamlin can not be used to modify Ehreth.

Therefore, it is respectfully submitted that claim 9 is allowable over Ehreth and Hamlin, either alone or in combination. Claim 16 depends upon independent claim 9 and is submitted to be patentable for at least the reasons described above with respect to claim 9 and for the further features recited therein. Also, claim 16 depends on claim 14, which was not rejected by Ehreth in view of Hamlin, thus the rejection of claim 16 is improper.

Independent claim 21 is drawn to a method for receiving and decoding signals from a telecommunications network and for transmitting the decoded signals to multiple devices. The method includes connecting the multiple devices and the telecommunications network to a residential gateway including a first television that is located in close proximity to the residential gateway and connected directly thereto. Televisions to view are selected by using remote control devices associated with the televisions and channel select command received from the remote control associated with television located in close proximity to the gateway are directly received by a receiver within the gateway. The channel select commands are transported to a network interface module and transmitted to the telecommunications network. The network interface module receives video signals from the telecommunications network and the video signals are transmitted to a video processor. The video signals are processed to into television signals and the television signals are transmitted to the corresponding televisions including the first television.

It is respectfully submitted that Ehreth and Hamlin, either alone or in combination, fail to teach or suggest all of the features of independent claim 21.

For example, Ehreth and Hamlin, either alone or in combination, fail to teach or suggest that "a first channel select command is received from a first remote control device, associated with a first television, directly by a receiver within the residential gateway, wherein the first television is located in close proximity to the residential gateway and connected directly to the residential gateway." As described in detail above with respect to claim 1, Ehreth discloses that the remote control 70 sends signals to channel selection and signaling unit 50, which sends a signal at a fixed user selected frequency to communication controller. Thus, the communication controller does not receive channel select commands directly from a remote control device nor is television 100 located in close proximity to the residential gateway. As described in detail above

with respect to claim 1, Hamlin discloses remote control 41 transmits signals to signal transceiver 40, which sends a signal to system controller 38, which in turn uses stored program code to send a control signal to converter 34. Thus, the converter 34 does not receive signals directly from remote control 42 nor is a television (receiving unit 14) located in close proximity to the converter 34.

The teachings of Hamlin may not be used to modify Ehreth without destroying Ehreth. As described in detail above, Ehreth discloses that the channel selection and receiving unit 50 must transmit a signal upstream to the receiver 80 in order for the modulating unit 34 to select a frequency to send the modulated signal. This modulated signal is sent to all of the channel selection and signaling units 50 located in a building, but only the channel selection and signaling unit 50 that is set to the proper frequency will forward the modulated signal to a television 100. Modifying Ehreth with the teachings of Hamlin would result in a single remote control that transmits a command signal to a control device. This would require replacing the channel selection and signaling units 50 with interface pods and replacing the residential gateway 30 with a new residential gateway and separate control device that controls the gateway. This essentially removes all of the elements taught by Ehreth and results in Hamlin. Thus, Hamlin can not be used to modify Ehreth.

Therefore, it is respectfully submitted that claim 21 is allowable over Ehreth and Hamlin, either alone or in combination. Claims 24 and 25 depend upon independent claim 21 and are submitted to be patentable for at least the reasons described above with respect to claim 21 and for the further features recited therein.

Claims 4, 5, 7, 11, 14, 17, 20, 23, 26-28, 30-33 and 36

In paragraph 6, the Examiner rejected claims 4, 5, 7, 11, 14, 17, 20, 23, 26-28, 30-33 and 36 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin and further in view of U.S. Patent No. 5,500,691 to Martin. Claims 30, 31 and 33 are independent while claims 4, 5 and 7 depend upon independent claim 1; claims 11, 14, 17 and 20 depend upon independent claim 9; claims 23 and 26 depend upon independent claim 21; claim 32 depends upon independent claim 31; and claim 36 depends upon independent claim 33. As discussed above, Ehreth and Hamlin, either alone or in combination, fail to teach or suggest all of the features of independent claims 1,

9 and 21. Martin is provided to disclose a receiver that can receive IR signals and transmit RF signals to a television. Therefore, Martin fails to alleviate any of the deficiencies of Ehreth and Hamlin.

For the reasons detailed above claims 4, 5, 7, 11, 14, 17, 20, 23 and 26-28 are allowable over Ehreth, Hamlin and Martin, combined or alone, and it is respectfully requested that the rejection be withdrawn.

Independent claim 30 is drawn to a method for receiving and decoding signals from telecommunications network and transmitting the decoded signals to multiple devices. The method includes connecting a residential gateway to a telecommunications network, to at least one television that is located remotely from the residential gateway and to a television that is located in close proximity to the residential gateway and connected directly to the residential gateway. A television channel to view on the remotely located television is selected using an optical remote control device that transmits optical signals to an optical conversion device connected to the television. The optical conversion device receives the optical signal and converts the signal to a RF signal and transmits the RF signal over media to a remote antennae module. The channel select commands are transmitted to the telecommunications network and a video signal is received from the telecommunications network. The video signal is processed to produce television signals and the television signals are transmitted to the television.

It is respectfully submitted that Ehreth, Hamlin and Martin, either alone or in combination, fail to teach or suggest all of the features of independent claim 30.

For example, none of the references disclose connecting a residential gateway to televisions that are located remotely from the gateway and to televisions that are located in close proximity to the gateway. This feature enables the present invention to provide a residential gateway that sits on or near one television, similar to a set-top cable box, and control all of the televisions throughout the house. As discussed in detail above, neither Ehreth nor Hamlin disclose having the residential gateway connected directly to a television located in close proximity to a television and receiving channel select commands directly from a remote control associated with the television. Martin fails to teach or suggest a residential gateway.

Independent claim 31 is drawn to a residential gateway that receives and decodes signals from a telecommunications network and transmits the decoded signals to a plurality of devices. The gateway includes a network interface module, a video processor, a remote control module and a wireless receiver. The wireless receiver receives wireless channel select commands from remote control device associated with a television located in close proximity to the residential gateway.

It is respectfully submitted that Ehreth, Hamlin and Martin, either alone or in combination, fail to teach or suggest all of the elements of independent claim 31.

For example, none of the references a residential gateway having a wireless receiver for receiving wireless channel select commands directly from a remote control device that is associated with a television located in close proximity. As described in detail above, neither Ehreth nor Hamlin disclose a residential gateway that receives wireless signals directly from a remote control device. Martin fails to teach or suggest a residential gateway and is provided merely to teach converting IR signals to RF.

Claim 32 depends upon independent claim 31 and is submitted to be patentable for at least the reasons described above with respect to claim 31 and for the further features recited therein.

Independent claim 33 is drawn to a system for receiving and decoding signals from a telecommunications network and transmitting the decoded signals to a plurality of devices. The system includes a residential gateway located in close proximity to and connected to a television. The residential gateway has a network interface module and a video processor. The system also includes an optical conversion device is located in close proximity to and connected to a remotely located television.

It is respectfully submitted that Ehreth, Hamlin and Martin, either alone or in combination, fail to teach or suggest all of the elements of independent claim 33.

For example, Ehreth and Hamlin fail to teach or suggest that a remotely located television is connected to an optical conversion device while a television located near the residential gateway is not connected to an optical conversion. As described in detail above, Ehreth requires that all of the televisions in a building are connected to a channel selection and signaling unit 50,

which is in turn connected to the communication controller 30. Hamlin discloses that one remote control device 41 is utilized to control all of the televisions in a building; this remote control signal is received at signal transceiver 40 and transmitted to system controller 38. Therefore, Ehreth and Hamlin, either alone or in combination, fail to teach connecting different televisions to the residential gateway in different manners. Martin is provided solely to teach an IR to RF conversion device and does not alleviate the deficiencies of Ehreth and Hamlin.

Claim 36 depends upon independent claim 33 and is submitted to be patentable for at least the reasons described above with respect to claim 33 and for the further features recited therein.

Claims 6 and 15

In paragraph 6, the Examiner rejected claims 6 and 15 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin in view of Martin. Claim 6 is dependent upon independent claim 1 and claim 15 is dependent upon independent claim 9. As discussed above, Ehreth and Hamlin, either alone or in combination, fail to teach or suggest all of the features of independent claims 1 and 15. Martin is provided to disclose a receiver that can receive IR signals and transmit RF signals to a television. Therefore, Martin fails to alleviate any of the deficiencies of Ehreth and Hamlin.

For the reasons detailed above claims 6 and 15 are allowable over Ehreth, Hamlin and Martin, combined or alone, and it is respectfully requested that the rejection be withdrawn.

Claims 12, 34, 42 and 44

In paragraph 8, the Examiner rejected claims 6 and 15 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin in further view of Martin in further view of Martinez. Claim 12 is dependent upon independent claim 9; claim 34 is dependent upon independent claim 33; and claims 41 and 44 are dependent upon independent claim 39.

With regards to claims 12 and 34, as discussed above, Ehreth, Hamlin and Martin, either alone or in combination, fail to teach or suggest all of the features of independent claims 9 and 33. Martinez is provided to disclose an optical conversion device that includes a bias switch and an oscillator. Therefore, Martin fails to alleviate any of the deficiencies of Ehreth and Hamlin.

Furthermore, as discussed above with regards to claim 39, Martinez fails to disclose the optical conversion device of claim 39.

With regards to claims 42 and 44, as discussed in detail above, Martinez fails to disclose all of the elements of independent claim 39. Ehreth, Hamlin and Martin are provided to teach using the optical conversion device that is connected to a television and sends signals to a residential gateway. Ehreth, Hamlin and Martin fail to alleviate the deficiencies of Martinez.

For the reasons detailed above claims 12, 34, 42 and 44 are allowable over Ehreth, Hamlin, Martin and Martinez, combined or alone, and it is respectfully requested that the rejection be withdrawn.

Claims 13, 35 and 44

In paragraph 9, the Examiner rejected claims 13, 35 and 44 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin in view of Martin in further view of Martinez. Claim 13 is dependent upon independent claim 9, claim 35 is dependent upon independent claim 33 and claim 41 is dependent upon independent claim 39.

With regards to claims 13 and 35, as discussed above, Ehreth, Hamlin and Martin, either alone or in combination, fail to teach or suggest all of the features of independent claims 9 and 33. Martinez is provided to disclose an optical conversion device that includes a bias switch and an oscillator. Therefore, Martin fails to alleviate any of the deficiencies of Ehreth and Hamlin. Furthermore, as discussed above with regards to claim 39, Martinez fails to disclose the optical conversion device of claim 39.

With regards to claim 44, as discussed in detail above, Martinez fails to disclose all of the elements of independent claim 39. Ehreth, Hamlin and Martin are provided to teach using the optical conversion device that is connected to a television and sends signals to a residential gateway. Ehreth, Hamlin and Martin fail to alleviate the deficiencies of Martinez.

For the reasons detailed above claims 13, 35 and 44 are allowable over Ehreth, Hamlin, Martin and Martinez, combined or alone, and it is respectfully requested that the rejection be withdrawn.

Claim 16

In paragraph 10, the Examiner rejected claim 16 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin in view of Martin. Claim 16 is dependent upon independent claim 9 and is submitted to be patentable for at least the reasons described above with respect to claim 9 and for the further features recited therein.

Claims 18 and 37

In paragraph 11, the Examiner rejected claim 16 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin in view of Martin in further view of U.S. Patent No. 5,521,631 to Budow. Claim 18 is dependent upon independent claim 9 and claim 37 is dependent upon independent claim 33. Budow is provided to teach using a diplex filter in cable television signal and does not alleviate any of the deficiencies of Ehreth, Hamlin and Martin. Therefore, it is respectfully submitted that claims 18 and 37 are patentable for at least the reasons described above with respect to independent claim 9 and 33 and for the further features recited therein.

Claims 19 and 38

In paragraph 12, the Examiner rejected claim 16 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin in view of Martin in further view of Budow in further view of U.S. Patent No. 5,901,340 to Flickinger. Claim 19 is dependent upon independent claim 9 and claim 38 is dependent upon independent claim 33. Flickinger is provided to teach using a balun in cable television signal and does not alleviate any of the deficiencies of Ehreth, Hamlin, Martin and Budow. Therefore, it is respectfully submitted that claims 19 and 38 are patentable for at least the reasons described above with respect to independent claim 9 and 33 and for the further features recited therein.

Claims 22 and 29

In paragraph 13, the Examiner rejected claims 22 and 29 under 35 U.S.C. § 103 as being obvious over Ehreth in view of Hamlin. Claims 22 and 29 are dependent upon independent claim 21 and are submitted to be patentable for at least the reasons described above with respect to claim 21 and for the further features recited therein.

Claim 40

In paragraph 14, the Examiner rejected claim 40 under 35 U.S.C. § 103 as being obvious over Martinez. Claim 40 is dependent upon independent claim 39 and is submitted to be patentable for at least the reasons described above with respect to claim 39 and for the further features recited therein.

Conclusion

For the foregoing reasons, Applicant respectfully submits that claims 1-9 and 11-45 are in condition for allowance. Accordingly, early allowance of claims 1-9 and 11-45 is earnestly solicited.

Should the Examiner feel that any of the claims rejections are still valid, Applicants respectfully submit that the finality of the previous Office Action be removed because of the erroneous rejections of claims 8, 16, 39, 41 and 43. Claims 8 and 16 are improperly rejected in paragraph 5 of the Office Action as being obvious over Ehreth in view of Hamlin. Claim 8 depends upon claim 4 and claim 16 depends upon claim 14. Claims 4 and 14 are not rejected by the Examiner in paragraph 5. These claims are rejected by the Examiner in paragraph in 6 as being obvious over Ehreth in view of Hamlin in view of Martin. Therefore, the rejection of claims 8 and 16 are improper because all of the limitations of the claims from which they depend have not been met. The improper rejection of claims 39, 41 and 43 is discussed in detail above. Also, it is submitted, that combination of Ehreth in view of Hamlin is improper for the reasons detailed above.

Should the Examiner have any questions or concerns, the Examiner should contact the undersigned to discuss.

Respectfully submitted,

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Craig A. Hallacher
Reg. No. 54,896

Technology, Patents and Licensing Inc.
6206 Kellers Church Road
Pipersville, PA 18947

Phone: (215) 766-2100
Fax: (215) 766-2920
email challacher@techpats.com